

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

CRAIG WILSON, ERIC BELLAMY,
KENDAL NELSON, and MAXIMINO
NIEVES, on behalf of themselves and those
similarly situated,

Petitioners,

v.

MARK WILLIAMS, warden of Elkton
Federal Correctional Institutions; and
MICHAEL CARVAJAL, Federal Bureau of
Prisons Director, in their official capacities,

Respondents.

Case No. 20-cv-0794

Judge James Gwin

FOURTH JOINT MOTION FOR STAY OF ALL PROCEEDINGS

Petitioners Craig Wilson, Eric Bellamy, Kendal Nelson, and Maximino Nieves, and Respondents Mark Williams and Michael Carvajal (collectively, the “Parties”) jointly move this Court to extend the stay of all proceedings in this matter for a further fourteen (14) days, through November 30, 2020. *See* ECF No. 211 (first joint motion for stay through October 9, 2020); ECF No. 228 (second joint motion for stay through October 30, 2020), and ECF No. 243 (third joint motion for stay through November 16, 2020). The Parties have continued to make substantial progress in settlement discussions, but the Parties require additional time to negotiate a few remaining terms to resolve this matter. The Parties request this additional time in order to reach an agreed resolution.

Specifically, the Parties request that all pending briefing deadlines, discovery, rulings on pending motions, and other actions in this litigation be suspended for the requested stay period. Respondents stipulate that they will continue filing daily testing status reports during the stay

period. The Parties further agree that the requested stay is not, in and of itself, to impact BOP's operations, but rather would be applicable only to this litigation itself.

Dated: November 13, 2020

Respectfully submitted,

/s/ David J. Carey (by consent)

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CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2020, the foregoing was filed with the Court's CM/ECF system. Notice of this filing will be sent by operation of that system to all counsel of record.

/s/ James R. Bennett II
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Attorney for Respondents